



# Haoma Mining NL

A.B.N 12 008 676 177

**Registered Office & Head Office:**

Tonic House, 386 Flinders Lane, Melbourne, Vic., 3000, GPO Box 2282U, Melbourne, Vic., 3001.

Telephone (03) 9629 6888, Facsimile (03) 9629 1250

Email: [haoma@roymorgan.com](mailto:haoma@roymorgan.com) Website: [www.haoma.com.au](http://www.haoma.com.au)

November 6, 2017

To all Haoma Mining NL Shareholders

The Directors of Haoma Mining NL wish to advise shareholders that Haoma Mining NL shares continue to be suspended from trading on the ASX.

Haoma's recent releases including an announcement of October 16 2017 titled "*Haoma recovers 'flat – watermelon seed-like' nuggets from conglomerates at the Comet Mine near Marble Bar*" and Haoma's September 2017 Quarterly Activities Report dated October 31, 2017 were not released by the ASX.

ASX has advised that Haoma's shares will remain suspended until such time as Haoma provides:

- sign-off by a Competent Person (as defined by the Australasian Code for Reporting of Exploration Results, Mineral resources and Ore Reserves – JORC Code) with respect to the results of exploration activities,
- a completed Table 1 in accordance with the JORC Code and Listing rule 5.6,
- information required in an announcement of exploration results for a material mining project in accordance with Listing Rule 5.7.

In order to avoid any confusion about the requirements for removal of suspension, attached hereto is all Haoma Mining correspondence with ASX detailing the ASX outstanding reporting requirements and Haoma's responses in reply thereto.

Yours sincerely,

**Gary C Morgan, B Comm.** – Economics & Pure Mathematics/Statistics, University of Melbourne  
**Chairman**

**Michele Levine, BSc.** Master Environmental Studies, University of Melbourne  
**Director**



3 November 2017

Mr Gary Morgan  
Chairman of Directors  
Haoma Mining NL  
401 Collins Street  
Melbourne VIC 3000

By email: [gary.morgan@roymorgan.com](mailto:gary.morgan@roymorgan.com)

Dear Mr Morgan

**Haoma Mining NL (“HAO”) – ongoing ASX enquiries**

ASX is in receipt of your further letter dated 3 November received at 6.03 pm this evening.

Suspending a company’s shares from trading is not a step that ASX takes lightly. HAO’s suspension is a direct result of it attempting to release to the market on 16 October information about exploration results that did not comply with Listing Rules 5.6 and 5.7.

As we explained in our 30 October letter:

“The requirements in Listing Rules 5.6 and 5.7 are long standing and important protections for investors and ASX takes compliance with them very seriously. They trace their roots back to the highly speculative and damaging trading that occurred in the late 60s and early 70s in Poseidon Nickel and are intended to prevent a re-occurrence.”

The draft announcement that HAO attempted to release on MAP on 16 October appeared to ASX not to meet the requirements of Listing Rules 5.6 and 5.7. Given that, ASX appropriately declined to publish it to the market and suspended trading in HAO’s shares.

The way in which HAO has approached this matter since then has not helped its cause to have the suspension lifted. Having been told of the non-compliance of its original 16 October announcement, HAO has attempted to release essentially the same information on three further occasions (in its 18 October announcement, its quarterly activities report and its annual report). Additionally, it has placed information on its website intended for release to the market before ASX released it on the market announcements platform, in breach of Listing Rule 15.6, and not complied with ASX’s directions to remove that material from its website, in breach of Listing Rule 18.8.

Your further letter this evening does not advance matters. In particular, the basis for, and the purpose you seek to serve with, the statement in your letter that: “Whilst we note the ASX’s view about whether JORC covers nuggets discovered by metal detectors, you do not state your position is unequivocal” is unclear.

ASX’s position is not equivocal. In our earlier letter today we stated explicitly that ASX did not agree with your statement that the JORC Code does not cover the discovery of gold nuggets from sampling by metal detectors and that:

“ASX’s view (which it has re-confirmed with executive members of the JORC Committee) is that the type of information HAO has attempted to release in its 16 and 18 October announcements, its most recent quarterly activities report and now its annual report **clearly constitutes** “explorations results”, as defined in the JORC Code. **Those documents must therefore include the information required under Listing Rules 5.6 and 5.7.**” [emphasis added]

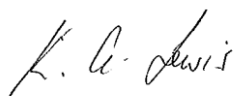
As to your suggested way forward of publishing all of the correspondence between HAO and ASX on these matters, that of course would involve ASX allowing HAO to publish to the market the very information to which ASX has taken objection because it does not accord with the Listing Rules. The act of releasing that correspondence will not cure HAO’s non-compliance with the Listing Rules and therefore will not result in HAO’s suspension being lifted.

As we said in our first letter dated today, if HAO’s position is that it is not able to include in its announcements the information required, and that its shareholders and the market are entitled to expect, under the Listing Rules, ASX is happy to have a conference call to discuss an alternative way forward. However, you should appreciate that this alternative way forward cannot, and will not, involve HAO releasing information about explorations results that does not comply with Listing Rules 5.6 and 5.7.

Accordingly, and as advised previously, trading in HAO’s shares will remain suspended until HAO provides satisfactory answers to the questions in ASX’s 26 October query letter.

ASX reserves the right under Listing Rule 18.7A to release a copy of this letter, as well as its two letters earlier today, to the market so that the market is informed about the reasons for HAO’s continuing suspension.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. Lewis', written in a cursive style.

Kevin Lewis  
Chief Compliance Officer, ASX Limited



# Haoma Mining NL

A.B.N 12 008 676 177

**Registered Office & Head Office:**

Tonic House, 386 Flinders Lane, Melbourne, Vic., 3000, GPO Box 2282U, Melbourne, Vic., 3001.

Telephone (03) 9629 6888, Facsimile (03) 9629 1250

Email: [haoma@roymorgan.com](mailto:haoma@roymorgan.com) Website: [www.haoma.com.au](http://www.haoma.com.au)

November 3, 2017

Mr Kevin Lewis  
Chief Compliance Officer  
ASX Compliance Pty Ltd  
20 Bridge Street  
**SYDNEY NSW 2000**

Dear Sir,

## **Dispute between Haoma Mining NL and the ASX**

We are in receipt of, and refer to, your reply to our letter of November 3, 2017.

Haoma Directors believe your decision not to reinstate Haoma on the ASX is to the detriment of not just Haoma shareholders, but also shareholders of other companies who hold tenements near Haoma.

On October 16, 2017 Haoma Directors believed their responsibility was to immediately release information regarding the discovery (for the first time) of a large number of "... flat – watermelon ‘seed-like’ nuggets from conglomerates at the Comet Mine near Marble Bar" – watermelon ‘seed-like’ nuggets similar to those found by Novo about 300km from Marble Bar.

So the ASX market is fully informed about this significant discovery, we suggest a way forward is for the ASX to publish all correspondence (see attached), as you have suggested. Haoma will also place the correspondence on Haoma’s web site and Haoma’s ASX site.

Whilst we note the ASX’s view about whether JORC covers nuggets discovered by metal detectors, you do not state that your position is unequivocal.

If you wish to discuss this further, we are pleased to discuss our respective positions and the way forward by telephone on Monday

Yours sincerely

**Gary C Morgan**  
CHAIRMAN



3 November 2017

Mr Gary Morgan  
Chairman of Directors  
Haoma Mining NL  
401 Collins Street  
Melbourne VIC 3000

By email: [gary.morgan@roymorgan.com](mailto:gary.morgan@roymorgan.com)

Dear Mr Morgan

**Haoma Mining NL (“HAO”) – ongoing ASX enquiries**

I refer to your letter dated 3 November claiming that “[the] JORC Code does not cover the discovery of [gold] nuggets from sampling by metal detectors”.

ASX does not agree. ASX’s view (which it has re-confirmed with executive members of the JORC Committee) is that the type of information HAO has attempted to release in its 16 and 18 October announcements, its most recent quarterly activities report and now its annual report clearly constitutes “explorations results”, as defined in the JORC Code. Those documents must therefore include the information required under Listing Rules 5.6 and 5.7.

As to your suggestion that HAO will comply with ASX’s direction to remove the relevant announcements from its website only if “ASX agrees to indemnify HAO and its Directors and Officers, on a full indemnity basis, in respect of all and any claims against it or them arising from any person suffering loss or damage as a result of the person not being provided with information about the significant gold nugget discoveries on [HAO’s] tenements”, ASX will not grant such an indemnity.

I repeat what I said in my letter of 30 October:

“ASX is **not** asking HAO to withhold information from its shareholders. Rather, ASX is asking HAO to include in its announcements on these matters the information required to be included, and that HAO’s shareholders and the market are entitled to expect, under the Listing Rules, including in particular Listing Rules 5.6 and 5.7.”

To protect HAO’s shareholders and other market participants from trading on a basis that is not properly informed (which coincidentally will help protect HAO and its directors and officers from potential legal action in that regard), trading in HAO’s shares will remain suspended until HAO provides satisfactory answers to the questions in ASX’s 26 October query letter.

Finally I pointed out to you in my letter this morning that the act of HAO reinstating the 16 and 18 October announcements on its website after initially acceding to ASX’s direction to take them down was a flagrant and wilful breach of HAO’s obligations under Listing Rule 5.6, 5.7, 15.6 and 18.8. HAO has now chosen to compound this by breach by adding to its website its quarterly activities report and annual report without the information required by Listing Rules 5.6 and 5.7 and without an acknowledgement under Listing



Rule 15.6 that these documents have been released to the market. ASX today has given HAO a further direction under Listing Rule 18.8 to remove the quarterly activities report and annual report from its website.

Please comply with ASX's directions forthwith or else you will leave ASX no choice but to take further action to enforce its rules.

ASX reserves the right under Listing Rule 18.7A to release a copy of this letter, as well as my letter earlier today, to the market so that the market is informed about the reasons for HAO's continuing suspension.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. Lewis', written in a cursive style.

Kevin Lewis  
Chief Compliance Officer, ASX Limited



# Haoma Mining NL

A.B.N 12 008 676 177

**Registered Office & Head Office:**

Tonic House, 386 Flinders Lane, Melbourne, Vic., 3000, GPO Box 2282U, Melbourne, Vic., 3001.  
Telephone (03) 9629 6888, Facsimile (03) 9629 1250  
Email: [haoma@roymorgan.com](mailto:haoma@roymorgan.com) Website: [www.haoma.com.au](http://www.haoma.com.au)

November 3, 2017

Mr Kevin Lewis  
Chief Compliance Officer  
ASX Compliance Pty Ltd  
20 Bridge Street  
**SYDNEY NSW 2000**

Dear Sir,

**Haoma Mining NL**

We refer to your letter dated November 3, 2017

We are advised that JORC does not cover the discovery of nuggets from sampling by metal detectors.

The Directors of Haoma will comply with the ASX's direction, and remove the 16 and 18 October 2017 announcements from the HAO website, if the ASX agrees to indemnify Haoma Mining NL and its Directors and Officers, on a full indemnity basis, in respect of all and any claims against it or them arising from any person suffering loss or damage as a result of the person not being provided with information about the significant gold nugget discoveries on Haoma's tenements.

Please confirm that an authorised officer of the ASX will agree to execute this indemnity on behalf of the ASX.

Yours sincerely

**Gary C Morgan**  
CHAIRMAN





3 November 2017

Mr Gary Morgan  
Chairman of Directors  
Haoma Mining NL  
401 Collins Street  
Melbourne VIC 3000

By email: [gary.morgan@roymorgan.com](mailto:gary.morgan@roymorgan.com)

Dear Mr Morgan

**Haoma Mining NL (“HAO”) – ongoing ASX enquiries**

I refer to your letter dated 1 November requesting that HAO’s shares be reinstated to trading on ASX and attaching HAO’s activities report for the quarter ended 30 September 2017 (the “Activities Report”) for release to the market.

It would appear to ASX that HAO is endeavouring to release through its Activities Report essentially the same information as it attempted to release in its 16 and 18 October 2017 announcements without the required Table 1 (Sections 1 & 2) or competent person sign off. ASX cannot allow this and so your Activities Report will not be released to the market in its current form.

You assert in your letter that the information HAO attempted to release in its 16 and 18 October announcements, and is now seeking to release in its Activities Report, is “similar to” that recently published by ARV, DEG and NVO. We assume that you are referencing the announcements by ARV on 23 October (as amended on 2 November), by DEG on 30 October and by NVO on 17 October 2017 (which makes reference to the discovery of gold nuggets announced by NVO on 12 July and 8 August 2017).

With respect, the information HAO has attempted to release to the market is not comparable to that released by ARV and DEG. In particular:

- ARV’s and DEG’s announcements included a completed JORC Code Table 1 (sections 1 and 2) and the information required under Listing Rule 5.7 – HAO’s attempted announcements do not.
- ARV’s and DEG’s announcements were based on the work of, and signed off by, a ‘competent person’, as defined in the JORC Code (see below) – it is not apparent from HAO’s attempted announcements that HAO has met these requirements.

NVO is a Toronto listed entity and subject to a different regulatory regime, and so its situation is not directly comparable to HAO. Nevertheless, NVO did include in its announcement a sign-off from a ‘qualified person’, the Canadian equivalent of a competent person.

I note the statement in your letter that the Activities Report has been prepared by yourself and Messrs Levine, Scales and Cole and that your and their qualifications are stated in the report. In the context of our earlier correspondence, we take this perhaps to suggest that you believe that you and they are ‘competent persons’ and entitled as such to sign off on the information in the Activities Report. If that is correct, that reveals a misunderstanding of the JORC Code.



The JORC Code (clause 11) defines a 'competent person' as:

“a minerals industry professional who is a Member or Fellow of The Australasian Institute of Mining and Metallurgy, or of the Australian Institute of Geoscientists, or of a 'Recognised Professional Organisation' (RPO), as included in a list available on the JORC and ASX websites...

A Competent Person must have a minimum of five years relevant experience in the style of mineralisation or type of deposit under consideration and in the activity which that person is undertaking.

If the Competent Person is preparing documentation on Exploration Results, the relevant experience must be in exploration...”

From what we can glean from the information in the Activities Report, Mr Cole may well be qualified to be a competent person for the purposes of the JORC Code (although it is not clear from that document that he meets all of the requirements above). If he is, he should be familiar with the requirements of the JORC Code, including the requirement in clause 9 for a report of exploration results to be based on, and fairly reflect the information and supporting documentation prepared by, a competent person or persons and for the report to be issued with the prior written consent of the competent person or persons as to the form and context in which it appears.

I also note the comment in your email to ASX accompanying the 18 October attempted announcement, repeated in the Activities Report, that: “It is also not possible to provide a JORC statement simply around gold nuggets.”

Neither ARV nor DEG appeared to have any difficulty doing this (nor did MAU in its announcement dated 2 November or G88 in its announcement dated 13 September).

If HAO's position is that it is not able to include in its announcements the information required, and that its shareholders and the market are entitled to expect, under the Listing Rules, then I suggest that we arrange a time for a conference call to discuss an alternative way forward.

In the meantime, ASX considers it appropriate that HAO remain suspended until it provides satisfactory answers to the questions in ASX's 26 October query letter. Accordingly, ASX declines your request for reinstatement.

Finally I note that HAO was directed by ASX on 26 October to remove the offending 16 and 18 October announcements from its website. HAO appeared initially to accede to this direction but the offending announcements were restored to the website at some point thereafter. ASX has directed HAO again on 1 November to remove these announcements from its website but at the time of writing they still remain on the website. This is a flagrant and wilful breach of HAO's obligations under Listing Rule 5.6, 5.7, 15.6 and 18.8.

The fact that these notices on their face are addressed to the ASX Market Announcements Office and appear to be announcements made to ASX, when there is nothing to indicate that ASX has refused to release them for non-compliance with the Listing Rules, is quite misleading.



Please comply with ASX's direction and remove the 16 and 18 October announcements from the HAO website forthwith or else you will leave ASX no choice but to take further action to enforce its rules.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. Lewis', written in a cursive style.

Kevin Lewis  
Chief Compliance Officer, ASX Limited



# Haoma Mining NL

A.B.N 12 008 676 177

**Registered Office & Head Office:**

Tonic House, 386 Flinders Lane, Melbourne, Vic., 3000, GPO Box 2282U, Melbourne, Vic., 3001.

Telephone (03) 9629 6888, Facsimile (03) 9629 1250

Email: [haoma@roymorgan.com](mailto:haoma@roymorgan.com) Website: [www.haoma.com.au](http://www.haoma.com.au)

November 1, 2017

Mr John Johansson  
Senior Adviser, Listings Compliance  
ASX Compliance Pty Ltd  
Level 4 North Tower Rialto  
525 Collins Street  
**MELBOURNE VIC**

Dear Sir,

## **Request for resumption of trading in Haoma Mining NL shares**

The Directors of Haoma request the ASX remove the suspension of trading in Haoma Mining securities.

Attached is Haoma's September Quarter Activities Report.

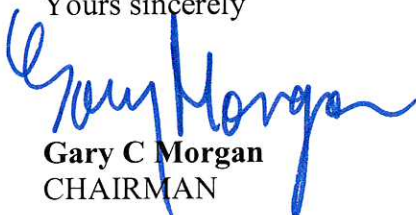
It has been prepared by Gary Morgan, Michele Levine, Professor Peter Scales and Peter Cole. The qualifications of each person are detailed in Haoma's attached report.

The current 'gold rush' in the Pilbara is the result of the ASX publishing announcements involving gold nugget discoveries by a number of companies including Artemis Resources (ASX: ARV) and Novo Resources (TSX-V: NVO) and by De Grey Mining (ASX: DEG). The gold nugget information published by those companies is similar to that reported by Haoma in relation to gold nuggets in Conglomerate Formations near Marble Bar.

Over the last 2 weeks Haoma has had approaches for Joint Venture participation with Haoma's gold tenements in the Eastern Pilbara. In addition there have been requests for Haoma share placements.

However, because Haoma is suspended and the last recorded share price was 23 cents, it is impossible to negotiate a commercially favorable outcome for Haoma shareholders.

Yours sincerely



**Gary C Morgan**  
CHAIRMAN



30 October 2017

Mr Gary Morgan  
Chairman of Directors  
Haoma Mining NL  
401 Collins Street  
Melbourne VIC 3000

By email: gary.morgan@roymorgan.com

Dear Mr Morgan

**Haoma Mining NL (“HAO”) – ongoing ASX enquiries**

I refer to your letter today to the Chairman of ASX Limited (“ASX”) Mr Rick Holliday-Smith. Your letter has been passed on to me, in my capacity as ASX’s Chief Compliance Officer, for a response.

In your letter you state:

*“Haoma’s directors considered the finding of a large number of nuggets in a Comet Mine Conglomerate formation was of significance and shareholders had to be informed. Therefore results with photos were released to the ASX on Monday October 16, 2017 – before share trading began at 10am.*

*To withhold [that] information would have resulted in the Directors being liable for future prosecution by ASIC and Haoma shareholders. ...*

*Haoma’s Directors have never and will never withhold shareholder information. We believe the ASX has no right to ask Haoma’s Directors to withhold significant information from shareholders.”*

**Background**

The background to your letter is that on 16 October, HAO attempted to release on the ASX Market Announcements Platform (“MAP”) an announcement about the discovery of gold nuggets in the Comet Mine Conglomerate formation. ASX withheld the announcement from release for apparent non-compliance with the Listing Rules and suspended trading in HAO’s shares pending clarification of queries raised by ASX in relation to the announcement.

ASX sent an email to your company secretary on 16 October explaining the reasons for not releasing the announcement and highlighting the areas that needed to be addressed to comply with the Listing Rules.

On 18 October, HAO attempted to release a further announcement on the same matter, which ASX also withheld from release because it did not adequately address the issues identified in our 16 October email.

Having reached an apparent impasse with HAO, ASX subsequently sent a detailed query letter to HAO on 26 October about the attempted 16 and 18 October announcements, asking questions to address the areas of potential non-compliance with the Listing Rules.

## The information required to be released

Contrary to the statement in your letter, ASX is **not** asking HAO to withhold information from its shareholders. Rather, ASX is asking HAO to include in its announcements on these matters the information required to be included, and that HAO's shareholders and the market are entitled to expect, under the Listing Rules, including in particular Listing Rules 5.6 and 5.7.

Listing Rule 5.6 requires a public report prepared by an entity that includes a statement of exploration results to be prepared in accordance with the Australasian Code for Reporting of Exploration Results, Mineral Resources and Ore Reserves (JORC Code), including in particular, clauses 9, 10, 11, 18 and 19 of that Code. If the announcement relates to a material mining project, it must also comply with Listing Rule 5.7.

Among other things, these require the production of a 'Table 1' addressing each of the criteria in sections 1 and 2 of that table on an 'if not why not' basis and various other information about the discovery (including information about sampling techniques, logging, location of data points, discussion of geological context and planned further work). The Table 1 must be based on and fairly reflect the work of a named 'competent person'.

The requirements in Listing Rules 5.6 and 5.7 are long standing and important protections for investors and ASX takes compliance with them very seriously. They trace their roots back to the highly speculative and damaging trading that occurred in the late 60s and early 70s in Poseidon Nickel and are intended to prevent a re-occurrence.

The draft announcements that HAO attempted to release on MAP on 16 and 18 October appeared to ASX not to meet the requirements of Listing Rules 5.6 and 5.7. Given that, ASX appropriately declined to publish them to the market and suspended trading in HAO's shares.

I note that despite this, and in apparent disregard of its obligations under Listing Rule 15.7 (which requires a listed entity not to release information that is for release to the market to any person until it has received an acknowledgment from ASX that the information has been released to the market), HAO chose to put the 16 and 18 October announcements on the "Announcements" page of its website. The announcements published on HAO's website had the appearance of actual market announcements, including being addressed to ASX, but there was no reference to the fact that ASX had declined to release them to the market for non-compliance with the Listing Rules. The inappropriateness of this should be self-evident. Suffice to say, ASX directed HAO to withdraw the 16 and 18 October announcements from its website, which HAO has now done (although, as at the time of writing this letter, broken links to the announcements still appear in the list of announcements on HAO's Announcements page).

## Reconciling HAO's obligation to release information immediately

The passages quoted from your letter above appear to argue that HAO is excused from compliance with Listing Rules 5.6 and 5.7 because it had an obligation under Listing Rule 3.1 to release the information included in its attempted 16 and 18 October market announcements "immediately". ASX does not agree.

The interaction between Chapter 5 and Listing Rule 3.1 is explained in section 9 of ASX Listing Rule Guidance Note 31 *Reporting on Mining Activities*. It states:

*"The reporting requirements for mining activities in Chapter 5 are an adjunct to, and operate in tandem with, the reporting and disclosure requirements in Chapter 3 (continuous disclosure) and Chapter 4 (periodic disclosure) of the Listing Rules.*

***For example, where an entity is required to disclose market sensitive information involving mining activities to ASX under Listing Rule 3.1, the information disclosed must comply not only with that rule but also with any applicable requirements in Chapter 5.***

*It should be noted that information required to be disclosed under Listing Rule 3.1 must be disclosed immediately. ASX has given guidance in Guidance Note 8: Continuous Disclosure: Listing Rules 3.1 – 3.1B that:*

- *“Immediately” does not mean “instantaneously”, but rather “promptly and without delay”.*
- *ASX recognises that the speed with which an entity can disclose information under Listing Rule 3.1 will vary, depending on factors such as where and when the information originated, the forewarning (if any) the entity had of the information, the amount and complexity of the information concerned, the need in some cases to verify the accuracy or bona fides of the information, and (importantly in this context):*

*“the need in some cases to comply with specific legal and Listing Rule requirements, such as the requirement for an announcement that relates to mining or oil and gas activities to comply with Chapter 5 of the Listing Rules.”*

- *ASX will take these factors into account, as well as whether or not the entity has promptly requested a trading halt to minimise the period that the market is trading on an uninformed basis, in assessing whether an entity has complied with its obligation to disclose information in a timely manner under Listing Rule 3.1.*

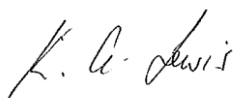
*All other things being equal, ASX considers that the requirement for an entity to disclose market sensitive information about a mining activity under Listing Rule 3.1, which is also subject to the reporting requirements in Chapter 5, will generally only be triggered when the entity is in possession of all of the information that it is required to include in a market announcement about that activity under Chapter 5. Prior to it having all of that information, ASX considers that whatever market sensitive information it may have about the activity will generally be insufficiently definite to warrant disclosure. Therefore, provided the market sensitive information is and remains confidential, ASX has not formed the view that it has ceased to be confidential, and a reasonable person would not otherwise expect it to be disclosed, it will generally fall within the carve-out to immediate disclosure in Listing Rule 3.1A.*

If what motivated the HAO board to attempt to release the 16 October announcement so quickly and without the information required under Listing Rules 5.6 and 5.7 was a concern that trading in HAO shares might otherwise occur on an uninformed basis, then well-known and well-tried mechanisms were available to HAO to prevent this occurring – ie requesting a trading halt or voluntary suspension to afford the time needed to make a proper and complete announcement of the information required under the Listing Rules.

As is appropriate in the circumstances, HAO will remain suspended until it provides a satisfactory response to ASX’s 26 October query letter.

Finally, I note the statement in your letter today that you intend to release copies of HAO’s correspondence with ASX on these matters. ASX will not be deterred by this from enforcing HAO’s compliance with the Listing Rules and reserves the right to release a copy of this letter to ensure the public record is complete.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. Lewis', written in a cursive style.

Kevin Lewis  
Chief Compliance Officer, ASX Limited





# Haoma Mining NL

A.B.N 12 008 676 177

**Registered Office & Head Office:**

Tonic House, 386 Flinders Lane, Melbourne, Vic., 3000, GPO Box 2282U, Melbourne, Vic., 3001.

Telephone (03) 9629 6888, Facsimile (03) 9629 1250

Email: [haoma@roymorgan.com](mailto:haoma@roymorgan.com) Website: [www.haoma.com.au](http://www.haoma.com.au)

October 30, 2017

Mr Rick Holliday-Smith  
Chairman  
ASX Ltd  
20 Bridge Street  
**SYDNEY NSW 2000**

CC:  
John Johansson  
Senior Adviser Listings Compliance (Melbourne)  
ASX Compliance Pty Ltd  
Level 4 North Tower Rialto  
525 Collins Street Melbourne VIC  
E: [john.johansson@asx.com.au](mailto:john.johansson@asx.com.au)

Dear Sir,

The Directors of Haoma Mining are in receipt of your October 26, 2017 request to provide more information on Haoma's significant discovery of many gold nuggets in a Comet Mine Conglomerate Formation. As soon as the detailed information you have requested is available we will make a further announcement to the market via the ASX and hopefully you will release it.

However the recent 'disruptive' discoveries of many gold nuggets in Western Pilbara Conglomerate Formations are of such significance both scientifically and in terms of market potential that we believe the market needs to be kept informed even though traditional geologists have not yet come to terms with the complex science.

Haoma is being advised by Professor Peter Scales, Department of Chemical Engineering, University of Melbourne. Professor Peter Scales and others are currently determining the age of nuggets from the Comet Mine Conglomerates Formations using SEM and other specialised techniques. Early indications from this work suggest there are two different populations of nuggets within the Comet Mine Conglomerates (this was referred to by Robert Skrzeczynski, Exploration Manager Operations – Australia, BHP Minerals, in his report to Haoma in August 1996, see attached BHP Minerals Report). However we are awaiting a formal report from Professor Peter Scales.

Many Haoma shareholders and ASX investors would be aware of the recent announcements and press publicity regarding the new discoveries of significant numbers of gold nuggets in Conglomerate Formations located in the **Western Pilbara Region** of Western Australia. Following Haoma's October 5, 2017 announcement, shareholders would be aware that the major discoveries were potentially of relevance to Haoma and them as shareholders, but without further information they had no way of understanding why those **Western Pilbara Region** announcements were of significance to Haoma and many other mineral exploration companies who hold other Pilbara tenements which contain Conglomerate Formations. (Some investors may have a better understanding since reading The Weekend Australian article "*The Pilbara is a goldmine for some*" and comments by Cliff Lawrenson, CEO, Atlas Iron regarding their Pilbara tenements – some of Atlas Iron tenements are jointly held with Haoma!).

We understand and respect your request for more information. However given the speed with which Nova, Artemis and De Grey shares increased upon their announcing discovering significant numbers of gold nuggets in Conglomerate Formations, similar to nuggets found in the



conglomerates on leases held by Haoma, we believed it was only right that Haoma shareholders were immediately informed.

Without Haoma's October 16, 2017 announcement, Haoma shareholders had no possible way of knowing that on Sunday October 15, 2017 Directors of Haoma Mining NL were advised that more than 100 nuggets had been found near the surface, in an area of approximately 150 meters (20-40 meters wide) of Conglomerate Formation near Comet Mine (location C2).



**Nuggets collected from area C2 – Conglomerates to the South West of the Comet Mine, total weight of nuggets 33.167g.**



**Fine gold collected in area C2 – Conglomerates to the South West of the Comet Mine, total sample weight 0.183g.**

The nuggets and some gold fines had been recovered over the previous 2 days at a shallow depth using a hammer and/or pick – not a bulldozer or other earth removing equipment. This area had previously been explored by both the Stubbs Family (previous owners of the Comet Mine, see SH&MT Stubbs 1992/93 & 1993/94 Exploration Reports: WAMEX, Mines Department Index, M8113–A39484 & 42569) and BHP Minerals on behalf of Haoma. Both reported only a small number of nuggets without finding *"a gold bearing conglomerate"*.

Haoma's directors considered the finding of a large number of nuggets in a Comet Mine Conglomerate formation was of significance and shareholders had to be informed. Therefore results

with photos were released to the ASX on Monday October 16, 2017 – before share trading began at 10am.

To withhold the information would have resulted in the Directors being liable for future prosecution by ASIC and Haoma shareholders.

As mentioned earlier we understand and respect your request for more information. However until such information is available we repeat our request that you release our October 16, 2017 announcement, perhaps you would be more comfortable to release the announcement with some form of qualification that you could record with the announcement.

As I said to John Johansson, Senior Adviser, Listings Compliance, on Friday October 27, 2017 we would at any time be pleased to discuss and address issues which concern the ASX regarding information released by Haoma.

Haoma's Directors have never and will never withhold shareholder information. We believe the ASX has no right to ask Haoma's Directors to withhold significant information from shareholders.

For complete transparency and to avoid confusion, tomorrow all correspondence with the ASX and this letter will be available on Haoma's web site.

Yours sincerely

A handwritten signature in black ink, appearing to read "Gary Morgan", with a long horizontal flourish extending to the right.

**Gary Morgan**  
Chairman  
Haoma Mining NL



26 October 2017

Mr Jim Wallace  
Company Secretary  
Haoma Mining NL  
401 Collins Street  
Melbourne VIC 3000

By email: jim.wallace@roymorgan.com

Dear Mr Wallace

**Haoma Mining NL (“HAO”): query letter**

ASX Limited (“ASX”) refers to the following:

- A. HAO’s announcement titled *“Haoma Mining’s tenements at the Bamboo Creek Mine and Comet Mine, near Marble Bar, contain Pyritic Conglomerate Materials in the Hardey Sandstone Formations”* lodged on the ASX Market Announcements Platform (“MAP”) on 5 October 2017 (the “5 October Announcement”), disclosing among other things:

*That “numerous mining companies involved in mineral exploration in the Pilbara Region of Western Australia” (including specifically Artemis Resources (“ARV”), Novo Resources (“NVO”) and De Grey Mining (“DEG”)) had recently reported “new discoveries of Conglomerate Formations hosting gold mineralisation including nuggets.”*

*“Haoma has recently received requests to release details on their tenement holdings that contain significant quantities of Conglomerate Materials.”*

*“Those Haoma areas which contain contact zones and rock types of the Lower Proterozoic Fortescue Group include Haoma’s mining tenements at Bamboo Creek (Figure 1) and Marble Bar Comet Mine (Figure 2) which contain Conglomerate Materials in the Hardey Sandstone Formations.”*

- B. HAO’s proposed ASX announcement of 16 October 2017 released on HAO’s website but not released on MAP titled *“Haoma Mining recovers ‘flat – watermelon seed-like’ nuggets from conglomerates at the Comet Mine near Marble Bar”* (the “16 October Release”). The announcement again referenced the recent discoveries by ARV, NVO and DEG and included the following statements:

*“While the estimated age of the conglomerate material has not been determined, due to the complex structural history of the Pilbara region, shareholders were advised the conglomerate occurs near the basal contact zones of the “Lower Proterozoic Fortescue Group” which are shown on Google Earth Geology (Figure 3, 6 & 18). The Fortescue Group are known to overlie the ca 3300 to 3500Ma old Archaean basement unconformity which is evidently highly prospective for gold.*

*On October 11, 2017 Haoma commenced surface sampling of Fortescue Group type rocks at 4 locations at Bamboo Creek and 3 locations at the Comet Mine near Marble Bar. Bulk samples of*

*approximately 50kg were collected from the seven conglomerate outcrop locations (C1 to C7). Those samples are now being processed and analysed at Haoma's Bamboo Creek laboratory.*

*'Flat' gold nuggets (Figure 11) and 'fine' gold (Figure 12) were collected from the conglomerate outcrop 'C2' (Figure 8 to 10) located to the South West of the Comet Mine near Marble Bar. Other gold nuggets (Figure 16) were also collected from conglomerate outcrop 'C3' (Figure 13 to 15) located to the North West of the Comet Mine.*

*At location 'C2' a significant number of 'flat' gold nuggets (Figure 11) were collected over a 150 metre section of the strike zone which is approximately 3 kilometres long. The nuggets were collected just below the surface of the conglomerate outcrop (about 30 meters wide) which continues to the South West of the Comet Mine. Preliminary results suggest the conglomerates are auriferous and represent a highly prospective target for ongoing exploration."*

- C. HAO's proposed ASX announcement of 18 October 2017 released on HAO's website but not released on MAP titled "Haoma Mining recovers 'flat – watermelon seed-like' nuggets from conglomerates at the Comet Mine near Marble Bar" (the "18 October Release"). The announcement included the following statements:

*"Flat gold nuggets were collected from the conglomerate outcrop 'C2' and located to the South West of the Comet Mine. More gold nuggets were collected from conglomerate outcrop 'C3' and located to the North West of the Comet Mine."*

- D. ASX listing rule 5.6 which provides:

*"Subject to rule 5.10, a public report prepared by an entity must be prepared in accordance with rules 5.7 to 5.24 if applicable and Appendix 5A (JORC Code) if applicable if the report includes a statement relating to any of the following:*

- *Exploration targets.*
- *Exploration results.*
- *Mineral resources or ore resources.*
- *Production targets."*

- E. ASX listing rule 5.7 which provides:

*"An entity publicly reporting in relation to a material mining project, either:*

- (a) exploration results for the first time; or*
- (b) any new exploration results,*

*must include all of the following information in a market announcement and give it to ASX for release to the market.*

*5.7.1 As an appendix to the market announcement, a separate report providing all information that is material to understanding the exploration results, in relation to each of the criteria in section 1 (sampling techniques and data) and section 2 (reporting of exploration results) of Table 1 in Appendix 5A (JORC Code). An entity that determines that one or more of those criteria is not material for this purpose must identify each such criterion and explain why it has determined that it is not material to understanding the exploration results."*

- F. Clause 9 of the JORC Code that provides:

*“A Public Report concerning a company’s Exploration Targets, Exploration Results, Mineral Resources or Ore Reserves is the responsibility of the company acting through its Board of Directors. Any such report must be based on, and fairly reflect, the information and supporting documentation prepared by a Competent Person. A company issuing a Public Report shall disclose the name(s) of the Competent Person, state whether the Competent Person is a full-time employee of the company, and, if not, name the Competent Person’s employer.”*

G. Clause 18 of the JORC Code which defines exploration results as:

*“Exploration Results include data and information generated by mineral exploration programmes that might be of use to investors but which do not form part of a declaration of Mineral Resources or Ore Reserves.*

*Examples of Exploration Results include results of outcrop sampling, assays of drill hole intersections, geochemical results and geophysical survey results.”*

H. Clause 19 of the JORC Code which defines exploration results as:

*“Public Reports of Exploration Results must contain sufficient information to allow a considered and balanced judgement of their significance. Reports must include relevant information such as exploration context, type and method of sampling, relevant sample intervals and locations, distribution, dimensions and relative location of all relevant assay data, methods of analysis, data aggregation methods, land tenure status plus information on any of the other criteria listed in Table 1 that are material to an assessment.”*

I. ASX notes that the ASX listed entities referred to in the 5 October Announcement and the 16 October Release (ARV and DEG) have included the information required for reporting Exploration Results under listing rule 5.7, including sections 1 and 2 of Table 1 of the JORC Code and an appropriate Competent Person’s Statement. ASX further notes the TSX-V listed entity referred to in the 5 October Announcement and the 16 October Release (NVO) included a statement prepared by a Qualified Person.

J. ASX further notes that it has not released the 16 October and 18 October Releases on MAP as they appear to ASX not to comply with the Listing Rule and JORC Code requirements mentioned above.

K. ASX Listing Rule 15.7 which provides:

*“An entity must not release information that is for release to the market to any person until it has given the information to ASX and has received an acknowledgement that ASX has released the information to the market.”*

***In accordance with Listing Rule 18.8, and to ensure compliance with Listing Rule 15.7, ASX hereby requires HAO to remove forthwith from its website the 16 October and 18 October Releases on the basis that it has not received an acknowledgement from ASX that ASX has released these announcements to the market, and to confirm to ASX when that has been done.***

Further, having regard to the above, ASX asks HAO to respond separately to each of the following questions and requests for information:

1. Who made the requests referenced in the 5 October Announcement for HAO *“to release details on their tenement holdings that contain significant quantities of Conglomerate Materials”* and when, and in what form, were those requests made?



2. Does HAO consider the information or any part thereof in the 16 October Release to be Exploration Results, within the meaning of clause 18 of the JORC Code?

If the answer is “no”, please explain why HAO does not consider the results of sampling and the disclosures in the release that:

- a) ‘Flat’ gold nuggets and ‘fine’ gold collected from the conglomerate outcrop ‘C2’;
- b) Other gold nuggets were also collected from conglomerate outcrop ‘C3’;
- c) At location ‘C2’ a significant number of ‘flat’ gold nuggets were collected over a 150 metre section of the strike zone which is approximately 3 kilometres long; and
- d) Preliminary results suggest the conglomerates are auriferous and represent a highly prospective target for ongoing exploration,

does not constitute data and information generated by mineral exploration programmes that might be of use to investors but which do not form part of a declaration of Mineral Resources or Ore Reserves.

3. If the answer to question 2 above is “yes”, please provide the details of the competent person (if any) who provided the information and supporting documentation for the 16 October Release?
4. If the answer to question 2 above is “yes”, please explain why HAO has not disclosed the information required by listing rule 5.7, including a completed Table 1, in the 16 October Release?
5. In respect of the ‘flat’ gold nuggets and ‘fine’ gold collected from the conglomerate outcrop ‘C2’ and the ‘other’ gold nuggets also collected from conglomerate outcrop ‘C3’ referred to in the 16 October and 18 October Releases, please provide the following details:
  - a) The location of outcrop C2, including by reference to location C2 of the figures included in the release;
  - b) The location of outcrop C3, including by reference to location C3 of the figures included in the release;
  - c) Sampling techniques;
  - d) Logging;
  - e) Sub-sampling techniques and sample preparation;
  - f) Verification of sampling;
  - g) Location of data points;
  - h) Data spacing and distribution;
  - i) Orientation of data in relation to geological structure;
  - j) Sample security;
  - k) Audits or reviews;
  - l) Mineral tenement and land tenure status;
  - m) Exploration done by other parties;
  - n) Geology;
  - o) Other substantive exploration data; and
  - p) Further work.

In providing the requested details, you may find Table 1, Sections 1 & 2 of the JORC Code instructive in explaining the level and nature of the detail to be disclosed.

If HAO is not able to provide the information above, please explain why that is the case.

### **When and where to send your response**

This request is made under, and in accordance with, Listing Rule 18.7. Your statement covering points 1 to 5 above is required as soon as reasonably possible and, in any event, by not later than half an hour before the start of trading (i.e. before 9.30 a.m. AEDT) on Friday 3 November 2017.

ASX reserves the right to release a copy of this letter and your response on the ASX Market Announcements Platform under Listing Rule 18.7A. Your statement should be sent to me by e-mail. It should not be sent directly to the ASX Market Announcements Office. This is to allow me to review your response to confirm that it is in a form appropriate for release to the market, before it is published on the ASX Market Announcements Platform.

### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to HAO's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*.

It should be noted that HAO's obligation to disclose information under Listing Rule 3.1 is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

If you have any queries or concerns about any of the above, please contact me immediately.

Yours sincerely

*[Sent electronically without signature]*

John Johansson  
Senior Adviser (Melbourne)



**From:** Jim Wallace [<mailto:Jim.Wallace@roymorgan.com>]

**Sent:** Thursday, 19 October 2017 10:24 AM

**To:** John Johansson <[John.Johansson@asx.com.au](mailto:John.Johansson@asx.com.au)>

**Cc:** Gary Morgan <[gary.morgan@roymorgan.com](mailto:gary.morgan@roymorgan.com)>; James Gerraty <[James.Gerraty@asx.com.au](mailto:James.Gerraty@asx.com.au)>

**Subject:** Haoma response to ASX email of October 19, 2017 advising that announcement will not be released

October 19, 2017

John Johansson  
Senior Adviser, Listings Compliance  
ASX Compliance Pty Ltd  
Level 4 North Tower Rialto  
525 Collins Street Melbourne VIC

Dear John,

Thank you for your note this morning.

In view of the current impasse, Haoma will withdraw the request for ASX to release announcements dated October 16 and October 18.

Haoma requests that ASX then lift the current suspension of trading in Haoma securities.

Kind regards

**Jim Wallace**

**Company Secretary**

Haoma Mining NL | Tonic House, 386 Flinders Lane Melbourne 3000

T: +613 9224 5142 | E: [jim.wallace@roymorgan.com](mailto:jim.wallace@roymorgan.com) | W: [www.haoma.com.au](http://www.haoma.com.au)

**From:** John Johansson [<mailto:John.Johansson@asx.com.au>]  
**Sent:** Thursday, 19 October 2017 8:41 AM  
**To:** Jim Wallace  
**Cc:** James Gerraty  
**Subject:** RE: Haoma Mining updated announcement for release to market

Hi Jim,

Please refer to further comments below for the updated announcement dated 18 October 2017.

ASX will not release the announcement in its current form.

Nuggets are considered to be exploration results under clause 19 of the JORC code and ASX listing rule 5.7.1.

The following information should be addressed with the updated announcement:

- Details of locations C1 to C7 should be identified clearly on a map.
- The details of the sampling methods used to recover the nuggets needs to be clearly explained.
- The total weight of nuggets in each of the images needs to be disclosed and the approximate area over which they were recovered.
- The report must include a description of the style and nature of the mineralisation. (JORC Clause 13).
- JORC Table 1 information needs to be completed to provide context to the nugget results. This should address all points in the table on an 'if-not, why-not' basis. Information should include details of sampling techniques, logging, sub-sampling (eg. panning, sieving), location of data points (eg. details of GPS unit used, coordinate system and level of accuracy/error), data spacing and distribution, tenement details etc.
- A statement by a competent person taking responsibility for the validity and reporting of the results.

Two recent announcements that have provided the level of detail that ASX is requesting:

- Artemis Resources (ARV) 7 September 2017. Update-High Grade Gold Nuggets at Silica Hills -Karratha, Western Australia; and
- Golden Mile Resources (G88) 13 September 2017: UPDATE - HIGH-GRADE GOLD AT LEONORA EAST

JORC references for your information:

JORC Clause 19 states:

“Reporting of selected information such as isolated assays, isolated drill holes, assays of panned concentrates or supergene enriched soils or surface samples, without placing them in perspective is unacceptable.”

JORC Clause 9 states:

“A Public Report concerning a company’s Exploration Targets, Exploration Results, Mineral Resources or Ore Reserves is the responsibility of the company acting through its Board of Directors. Any such report must be based on, and fairly reflect, the information and supporting documentation prepared by a Competent Person. A company issuing a Public Report shall disclose the name(s) of

the Competent Person, state whether the Competent Person is a full-time employee of the company, and, if not, name the Competent Person's employer."

Regards,

**John Johansson**

Senior Adviser, Listings Compliance

ASX Compliance Pty Ltd | Level 4 North Tower Rialto 525 Collins Street Melbourne | VIC  
+61 3 9617 8770 | john.johansson@asx.com.au

**From:** John Johansson [<mailto:John.Johansson@asx.com.au>]  
**Sent:** Wednesday, 18 October 2017 10:21 AM  
**To:** Jim Wallace  
**Subject:** RE: Haoma Mining updated announcement for release to market

Hi Jim,

Thanks for the update. We will review and get back to you.

Regards,

**John Johansson**  
Senior Adviser, Listings Compliance

ASX Compliance Pty Ltd | Level 4 North Tower Rialto 525 Collins Street Melbourne | VIC  
+61 3 9617 8770 | [john.johansson@asx.com.au](mailto:john.johansson@asx.com.au)

**From:** Jim Wallace [<mailto:Jim.Wallace@roymorgan.com>]  
**Sent:** Wednesday, 18 October 2017 10:07 AM  
**To:** John Johansson <[John.Johansson@asx.com.au](mailto:John.Johansson@asx.com.au)>  
**Cc:** Gary Morgan <[gary.morgan@roymorgan.com](mailto:gary.morgan@roymorgan.com)>  
**Subject:** Haoma Mining updated announcement for release to market

Hi John,

Attached is an amended release from the version sent to ASX on October 16.  
We have taken into consideration the points raised by ASX as per your email below.  
However please note that:

- Haoma will not release co-ordinates or other details that would define the exact locations as this would expose Haoma to significant tenement security issues.
- It is also not possible to provide a JORC statement simply around gold nuggets. We have limited the scope of the announcement to a report advising that we have found many nuggets at two locations and we will investigate further.  
We have provided photographic evidence of the nuggets and of the locations where they were collected.
- In paragraph two we have included a clarification around the age of the material from what was released on October 5. We trust this is acceptable.

We request that ASX now allow release of the attached announcement.

Kind regards

**Jim Wallace**  
**Company Secretary**

Haoma Mining NL | Tonic House, 386 Flinders Lane Melbourne 3000  
T: +613 9224 5142 | E: [jim.wallace@roymorgan.com](mailto:jim.wallace@roymorgan.com) | W: [www.haoma.com.au](http://www.haoma.com.au)

**From:** John Johansson [<mailto:John.Johansson@asx.com.au>]

**Sent:** Tuesday, 17 October 2017 5:58 PM

**To:** Jim Wallace

**Subject:** Suspension of the shares in HAO

Hi Jim,

FYI: HAO will be automatically suspended tomorrow at 09:30am unless you seek voluntary suspension (which mean the suspension request comes from HAO and it not prompted by ASX) or you can release the amended announcement covering off on my questions I raised yesterday.

Have a good evening.

Regards,

**John Johansson**

Senior Adviser, Listings Compliance

ASX Compliance Pty Ltd | Level 4 North Tower Rialto 525 Collins Street Melbourne | VIC

+61 3 9617 8770 | [john.johansson@asx.com.au](mailto:john.johansson@asx.com.au)

The information in this email is confidential, it may also be privileged and is intended for the exclusive use of the addressee(s). If you have received this email in error, please do not distribute it, notify me and destroy the original message and all copies. The unauthorised use of this email may result in liability for breach of confidentiality, privilege or copyright. E-mail transmissions cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete or contain viruses. The sender does not accept liability for errors or omissions in the contents of this message which arise as a result of e-mail transmission.

**From:** John Johansson [<mailto:John.Johansson@asx.com.au>]

**Sent:** Monday, 16 October 2017 4:55 PM

**To:** Jim Wallace

**Subject:** Haoma Mining announcement titled: Haoma Mining recovers 'flat – watermelon seed-like' nuggets from conglomerates at the Comet Mine near Marble Bar

Hi Jim,

Refer to reasons below why the announcement was not released to the market.

The information in the Haoma Mining (HAO) announcement this morning that relates to collection of gold nuggets, surface sampling and mapping of conglomerate outcrops all qualifies as exploration results under the ASX Listing Rules and the JORC code. These are industry standard exploration methods and results and have nothing to do with Haoma Mining's proprietary metallurgical processes. The company should report the results in compliance with JORC and the Listing Rules with the endorsement of a recognised Competent Person.

These are the same requirement we have expected from all other companies when reporting results of gold nugget sampling and other visual exploration results.

This announcement should not be released to the market unless all of the following points are addressed:

1. Exploration Results.
  - All details in section 1 and 2 of JORC Table 1 should be completed to provide context to the exploration results as per ASX Listing Rule 5.7.1. This should specifically address details of sampling techniques, logging, location of data points, discussion of geological context and planned further work etc.
  - Comments relating to the items in the relevant sections of Table 1 should be provided on an 'if not, why not' basis by a competent person as per Clause 5 of the JORC code.
  - Include a statement by a Competent Person under the JORC Code that satisfies all of the requirements of ASX Listing Rule 5.22 in relation to the exploration results, figures, geological discussion and interpretations presented in the announcement.
2. Maps and figures.
  - Provide a reference and date for the source of the geology maps presented in Figure 3, Figure 6 and Figure 18. This is not "Google Earth Geology" and appears to be the GSWA interpreted bedrock geology.
  - Include clearly labelled reference points for the mentioned conglomerate outcrop locations (C1 to C7).
  - Include an appropriately scaled map to clearly show the location and distribution of the recovered nuggets and fine gold over the 150m sampled section and the 3 km of conglomerate outcrop C2.
  - Include labelled reference points for each of the 50kg bulk samples. Include specific details of the sampling methods and spatial distribution of each of the samples in JORC Table 1. For example was each sample collected from a single point or aggregated from a broader area of outcrop?
  - Clarify what each of the labelled XY coordinate point is referring to in Figure 3, 4, 6, 7, 18 and 19.
  - Clarify what the green lines and gold stars represent in each of the figures in the announcement.



- Specifically explain in the body of the announcement how these lines were interpreted and what work has been done to validate the interpretations if any. The lines appear to trace various different lithology contacts (and different rock types), unaltered from the GSWA mapping interpretations.

Regards,

**John Johansson**

Senior Adviser, Listings Compliance

ASX Compliance Pty Ltd | Level 4 North Tower Rialto 525 Collins Street Melbourne | VIC

+61 3 9617 8770 | john.johansson@asx.com.au

The information in this email is confidential, it may also be privileged and is intended for the exclusive use of the addressee(s). If you have received this email in error, please do not distribute it, notify me and destroy the original message and all copies. The unauthorised use of this email may result in liability for breach of confidentiality, privilege or copyright. E-mail transmissions cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete or contain viruses. The sender does not accept liability for errors or omissions in the contents of this message which arise as a result of e-mail transmission.

The information in this email is confidential, it may also be privileged and is intended for the exclusive use of the addressee(s). If you have received this email in error, please do not distribute it, notify me and destroy the original message and all copies. The unauthorised use of this email may result in liability for breach of confidentiality, privilege or copyright. E-mail transmissions cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete or contain viruses. The sender does not accept liability for errors or omissions in the contents of this message which arise as a result of e-mail transmission.

**From:** John Johansson [<mailto:John.Johansson@asx.com.au>]  
**Sent:** Monday, 16 October 2017 1:30 PM  
**To:** Gary Morgan  
**Cc:** Jim Wallace; Tim Ingram; Michele Levine  
**Subject:** RE: Haoma Mining letter to ASX

Hi Gary,

I can confirm that we are processing the trading halt.

You will need to forward the formal trading halt request as well stating why you are requesting the halt.

Regards,

**John Johansson**  
Senior Adviser, Listings Compliance

ASX Compliance Pty Ltd | Level 4 North Tower Rialto 525 Collins Street Melbourne | VIC  
+61 3 9617 8770 | [john.johansson@asx.com.au](mailto:john.johansson@asx.com.au)

**From:** Gary Morgan  
**Sent:** Monday, 16 October 2017 12:50 PM  
**To:** 'John.Johansson@asx.com.au'  
**Cc:** Jim Wallace; Gary Morgan; Tim Ingram; Michele Levine  
**Subject:** Haoma Mining letter to ASX

October 16, 2017

John Johansson  
Senior Adviser, Listings Compliance  
ASX Compliance Pty Ltd  
Level 4 North Tower Rialto  
525 Collins Street Melbourne VIC

E: [john.johansson@asx.com.au](mailto:john.johansson@asx.com.au)

Dear Sir,

Today you made a decision not advise Haoma Mining shareholders of the attached market announcement “Haoma Mining recovers ‘flat – watermelon seed-like’ nuggets from conglomerates at the Comet Mine near Marble Bar”.

Haoma Mining is disappointed with your decision as the proposed ASX release advised shareholders of significant information regarding a large number of nuggets recovered from Comet Mine conglomerates near Marble Bar.

Withholding the report means Haoma’s shareholder and the ASX market is uninformed.

We requests the ASX place Haoma’s shares in a trading halt until such time as the information is released.

Allowing the ASX market to continue to trade in Haoma shares without the information could result in significant losses to persons dealing in Haoma securities or shareholders in companies with nearby tenements.

Yours sincerely

Gary Morgan  
Chairman  
Haoma Mining NL

**From:** John Johansson [<mailto:John.Johansson@asx.com.au>]  
**Sent:** Monday, 16 October 2017 10:15 AM  
**To:** Jim Wallace  
**Subject:** FW: Haoma mining announcement 5/10/17

Hi Jim.

I received an announcement from you this morning.

You will need to fix up the old announcement first before any other announcements are being put through.

Normally a rectification is done within 2 business days but this has been 6 business days now.

I will delete the new announcement off my system.

Regards,

**John Johansson**  
Senior Adviser, Listings Compliance

ASX Compliance Pty Ltd | Level 4 North Tower Rialto 525 Collins Street Melbourne | VIC  
+61 3 9617 8770 | [john.johansson@asx.com.au](mailto:john.johansson@asx.com.au)

**From:** John Johansson  
**Sent:** Friday, 6 October 2017 8:52 AM  
**To:** 'Jim Wallace' <[Jim.Wallace@roymorgan.com](mailto:Jim.Wallace@roymorgan.com)>  
**Subject:** RE: Haoma mining announcement 5/10/17

Thanks Jim.

Regards,

**John Johansson**  
Senior Adviser, Listings Compliance

ASX Compliance Pty Ltd | Level 4 North Tower Rialto 525 Collins Street Melbourne | VIC  
+61 3 9617 8770 | [john.johansson@asx.com.au](mailto:john.johansson@asx.com.au)

**From:** Jim Wallace [<mailto:Jim.Wallace@roymorgan.com>]  
**Sent:** Thursday, 5 October 2017 10:37 PM  
**To:** John Johansson <[John.Johansson@asx.com.au](mailto:John.Johansson@asx.com.au)>  
**Subject:** Re: Haoma mining announcement 5/10/17

Hi john

Im on leave friday and will be back monday. So will have to look at it then. It was written by our geologist who finished up this week so I might have to get someone else to review.

Kind regards  
Jim Wallace

Sent on the go with Vodafone

----- Original message -----

From: John Johansson <[John.Johansson@asx.com.au](mailto:John.Johansson@asx.com.au)>

Date: 05/10/2017 7:28 PM (GMT+10:00)

To: Jim Wallace <[Jim.Wallace@roymorgan.com](mailto:Jim.Wallace@roymorgan.com)>

Subject: Haoma mining announcement 5/10/17

Hi Jim,

I had a look at the announcement that was released today (Conglomerate Materials in the Hardey Sandstone Formations).

It seems like the following clarification needs to be made in an updated announcement:

1. The announcement refers to the Fortescue Group rocks as “Lower Proterozoic” in age. This is factually incorrect as there is a volume of published literature that confirms the Fortescue Group and comparable Witwatersrand conglomerates are actually Archean in age.
2. The announcement should also provide evidence for stating the presence of Fortescue Group conglomerates presented in Figure1 and Figure2. If this is based on exploration work or published literature then the sources should be referenced in the announcement. It currently looks like drawn rough lines in Google Earth. If you add a source, there should also be a competent person statement.

Please call me tomorrow if you would like to discuss.

Thanks.

**John Johansson**

Senior Adviser, Listings Compliance

ASX Compliance Pty Ltd | Level 4 North Tower Rialto 525 Collins Street Melbourne | VIC  
+61 3 9617 8770 | [john.johansson@asx.com.au](mailto:john.johansson@asx.com.au)

The information in this email is confidential, it may also be privileged and is intended for the exclusive use of the addressee(s). If you have received this email in error, please do not distribute it, notify me and destroy the original message and all copies. The unauthorised use of this email may result in liability for breach of confidentiality, privilege or copyright. E-mail transmissions cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete or contain viruses. The sender does not accept liability for errors or omissions in the contents of this message which arise as a result of e-mail transmission.

The information in this email is confidential, it may also be privileged and is intended for the exclusive use of the addressee(s). If you have received this email in error, please do not distribute it, notify me and destroy the original message and all copies. The unauthorised use of this email may result in liability for breach of confidentiality, privilege or copyright. E-mail transmissions cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete or contain viruses. The sender does not accept liability for errors or omissions in the contents of this message which arise as a result of e-mail transmission.

The information in this email is confidential, it may also be privileged and is intended for the exclusive use of the addressee(s). If you have received this email in error, please do not distribute it, notify me and destroy the original message and all copies. The unauthorised use of this email may result in liability for breach of confidentiality, privilege or copyright. E-mail transmissions cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete or contain viruses. The sender does not accept liability for errors or omissions in the contents of this message which arise as a result of e-mail transmission.